

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 2:19-cr-00013
)	
v.)	Chief Judge Crenshaw
)	
GEORGIANNA A.M. GIAMPIETRO)	

UNITED STATES' PROPOSED VERDICT FORM FOR COUNT ONE

The United States of America, by and through its attorneys, the Acting United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, hereby files the Government's Proposed Verdict Form. While the parties agree upon the verdict form as it relates to Counts Two and Three, the parties could not agree as to the verdict form on Count One, even after extensive consultation.

The Government specifically objects to the defense counsel's separately submitted verdict form for Count One as the Government does not believe unanimity as to the means by which the defendant committed Count One is necessary. Contemporaneously with this filing, the Government is submitting a memorandum in support of its position on Count One.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2021, I electronically filed one copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for all defendants in this case.

/s/ Kathryn D. Risinger
KATHRYN D. RISINGER
Deputy Criminal Chief – Organized Crime